

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

In re: PHARMACEUTICAL INDUSTRY)	
AVERAGE WHOLESale PRICE)	
LITIGATION)	MDL No. 1456
)	Civil Action No. 01-12257-PBS
_____)	
)	Hon. Patti B. Saris
THIS DOCUMENT RELATES TO:)	
)	Magistrate Judge Marianne B.
<i>United States of America, ex rel. Ven-a-Care</i>)	Bowler
<i>of the Florida Keys, Inc. v. Abbott</i>)	
<i>Laboratories, Inc.,</i>)	
CIVIL ACTION NO. 06-CV-1337-PBS)	

EXHIBIT F
to

RELATORS' MEMORANDUM OF LAW IN SUPPORT OF ITS
MOTION TO COMPEL ABBOTT LABORATORIES, INC TO
PRODUCE OR CONSENT TO ACCESS TO AND SHARING OF ALL
DISCOVERY PRODUCED BY ABBOTT IN OTHER FALSE PRICE
REPORT LITIGATION

THE BREEN LAW FIRM, P.A.

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March 20, 2007

SENT VIA FEDERAL EXPRESS

Jim Daly

Jones Day

77 West Wacker Suite 3500

Chicago, IL 60601-1692

Re: *U.S. ex rel. Ven-A-Care of the Florida Keys, Inc., et al v. Abbott Laboratories, Inc., et al*, MDL No 1456 Civil Action No. 01-CV-12257

Dear Jim,

Pursuant to paragraph 7 of our jointly proposed Case Management Order 29 and the instructions of Judge Saris at our last hearing, I have selected samples of documents which I believe are representative of documents that Abbott has produced in the Texas or other state actions, but withheld in the United States' action. The sample documents are copied to the enclosed CD. My staff and I have attempted to include only documents that Abbott has withheld from its production to the United States or produced only recently with copies of Texas depositions after significant effort on our part to persuade Abbott to do so. I am also advised that Abbott has today delivered additional documents to Texas Assistant Attorney General, Ray Winter and Ven-A-Care counsel, Jarrett Anderson at your Chicago offices as they are currently conducting depositions there. I have not had an opportunity to review these additional documents; however, I wish to include them in this process if they have not been produced to the United States. I have been advised that they are labeled as TXABT-673723 through TXABT-674367.

I will forward to you, under separate cover, an index of the sample documents that should facilitate our discussions.

Please let me know if you have any questions.

Sincerely,


James J. Breen, Esq.

JJB/rs

CC: (without enclosures)

Renee Brooker (US DOJ)

Mark Lavine (Assist. U.S. Attorney)